

1 JANE / JOHN DOE

2 Email: [JWHater@protonmail.com](mailto:JWHater@protonmail.com)

3

4 *Pro se*

5

6 **IN THE UNITED STATES DISTRICT COURT FOR THE**  
**SOUTHERN DISTRICT OF NEW YORK**

7

8 IN RE: DMCA SUBPOENA TO GOOGLE, LLC | Case No.: 7:20-mc-00119

9

10 **JANE / JOHN DOE'S REPLY IN SUPPORT**  
**OF THE OBJECTION AND MOTION TO**  
**QUASH DMCA SUBPOENA**

11

12

13 **A. INTRODUCTION**

14

15 While it is true that Jehovah's Witnesses are well known for their distribution of  
16 Bible based books and publications, they are also a notorious group of criminal  
17 pedophiles running a scam "religion" who are guilty of abuse of process and emotional  
18 extortion through sham litigation in their pathetic efforts at discovering leaks and  
19 moles and whistleblowers. Unfortunately for them, this is the year 2020 and things  
20 like VPNs, anonymous proxies, and TOR exit nodes frustrate them at every turn.

21

22 Whether one is known as *Darkspilver* or *John Redwood* or *JW Apostate*, or any  
23 number of other pseudonyms, it does not really matter as we are all Spartacus in this  
24 fight! Reporting on and exposing to public comment and ridicule the doctrinal  
25 inconsistencies and reversals, failed predictions, mistranslation of the Bible, harsh  
26

1 treatment of former members and autocratic and coercive leadership (**not to mention**  
 2 **the child raping!**) is a public duty that *Jane / John Doe* takes extremely seriously at  
 3 great personal risk.<sup>1</sup>

5 Because movant is proceeding *pro se*, this Court is required to construe her/his  
 6 submissions to raise the strongest arguments they suggest. *Davis v. United States*, 643  
 7 F. App'x 19, 22 (2d Cir. 2016) (citing *Haines v. Kerner*, 404 U.S. 519, 520 (1972))  
 8 and note that *pro se* pleadings are held “to less stringent standards than formal  
 9 pleadings drafted by lawyers.” *Haines*, 404 U.S. at 520.  
 10  
 11

#### 12

#### 13

#### 14 **B. REPLY ARGUMENT**

15 For reasons outlined below, the Watch Tower pedophile organization does not  
 16 have a valid copyright claim for any of the videos allegedly made available via this  
 17 YouTube account. Nor are they entitled to a subpoena because they never completed  
 18 the copyright registration process prior to their attempt at enforcement of their alleged  
 19 intellectual property rights. And they also did not meet the necessary burden outlined  
 20 by the Second Circuit in *Arista Records* so as to even be entitled to a DMCA  
 21  
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23  
 24 <sup>1</sup> Former Governing Body member Raymond Franz has accused the movement’s  
 25 Governing Body of resenting, deprecating and seeking to silence alternative viewpoints within the  
 26 organization and demanding organizational conformity that overrides personal conscience. He  
 27 claimed the Watch Tower Society confirmed its position when, in a 1954 court case in Scotland,  
 28 Watch Tower Society legal counsel Hayden C. Covington said of Jehovah’s Witnesses: “We must  
 have unity ... unity at all costs”. He also stated that Witnesses are subject to a disciplinary system  
 that encourages informants.

1 subpoena! Lastly, Google / YouTube is not subject to the subpoena power of New  
 2 York courts.  
 3  
 4

5 **1. REPORTER SHIELD LAWS APPLY**

7 *Jane / John Doe* cited the California Reporter Shield Laws because that is the  
 8 jurisdiction where Google / YouTube is located. New York Shield Laws were cited  
 9 because that is where this case is filed. The whole purpose of the *JW Apostate*  
 10 YouTube channel (and others like it) is to critique the Jehovah's Witnesses pedophile  
 11 gang and to provide materials for others to critique. Material such as:  
 12  
 13

14	How Can You Support LDC?
15	Choose Your Apps Wisely
16	Whose Leadership Can You Trust?
17	Congregation Accounting Training: Issuing Donation Acknowledgement Letters
18	Congregation Accounting Training: Transferring Funds to and From the Branch Office
19	Congregation Accounting Training: Monthly Congregation Accounts Report (S-30)
20	Congregation Accounting Training: Tutorials for Congregation Accounting-Introduction
21	Congregation Accounting Training: Roles and Responsibilities
22	Congregation Accounting Training: Setting Up and Maintaining a Bank Account

24 are not "complete videos", as alleged by Paul Polidoro in his "affirmation" (Doc# 10),  
 25 but are really either secret recordings of Watch Tower meetings personally made by  
 26 people on the inside trying to whistle blow or are EDITED videos containing only the  
 27  
 28

1 material needed so as to inform the public about these anti-government, child  
 2 molesting religious fanatics.<sup>2</sup>  
 3

4 As the Court knows, the First Amendment has particularly strong shields  
 5 protecting criticism of religion. See, e.g., *Hustler Magazine, Inc. v. Falwell*, 485 U.S.  
 6 46 (1988). Social media accounts like *JW Apostate* and others allegedly run by *Jane /*  
 7 *John Doe* are criticizing the secretive nature of the Watch Tower criminals and are  
 8 exposing and highlighting their vindictive practices that abuse members and former  
 9 members (**not to mention exposing all the baby rapists**).<sup>3</sup> The material posted online  
 10 has the thinnest of copyright – non-creative, non-commercial recordings of meetings  
 11 attended by the public, and because of the DMCA take-down process, the Watch  
 12

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 18       <sup>2</sup> While I understand that Polidoro is a close friend of Judge Seibel, he really is a  
 19 notorious child rapist and a well-known vexatious litigant who goes around filing bogus DMCA  
 20 subpoena requests with his pet judge as a means of judicial *doxing* and bullying as he never follows  
 21 through with ANY copyright enforcement at all! So you really should be more skeptical of his butt-  
 22 hurt IP claims and not be in such a hurry to rubber stamp whatever he puts in front of you, please.  
 23

24       <sup>3</sup> The Governing Body says they are the only mouthpiece of God on earth and are  
 25 divinely given the ruler ship of all mankind as the parable directed “faithful and discreet slave”. It is  
 26 an ultimate poser position of being treated as a God on earth while you claim to be a humble leader of  
 27 the only true religion. This fantasy of divine support and power seems to crumble when forced to  
 28 face actual authorities to answer for polices that allow the rape of innocent children. Recently Gerrit  
 29 Lösch, a senior member of the Witnesses’ Governing Body, was summoned for a deposition in San  
 30 Diego to answer questions about his role in child molestation. Instead of obeying the “laws of  
 31 Caesar”, he ran like a bitch and refused to cooperate or attend this opportunity to exonerate the  
 32 actions of the Governing Body by offering clarifying testimony to show their innocence. Losch even  
 33 denied he was part of the religion as he arrogantly refused to attend and cost the Worldwide Work  
 34 donation fund thirteen and a half million dollars after being found in contempt for defying a simple  
 35 San Diego, CA, court order. **Does that seem like a ‘faithful and discreet slave’ to you?**

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 SUBPOENA- 4

1 Tower already has their cure for the situation (at least until I go back to posting even  
2 more of their shit elsewhere).

3  
4 Many of the millions of viewers of this YouTube channel (and others) claimed  
5 they used these videos for their own commentary and criticism, like doing a  
6 theological audit and that even posting something Watch Tower made is an act of  
7 rebellion because of the high degree of secrecy the religion has. The JW pedophile  
8 gang are butt-hurt on account of getting exposed for their hypocrisy and they are using  
9 copyright law to try to bully and shut down dissenters. Instead they run to their pet  
10 judge who willingly rubber stamps any document under her nose in an effort to help  
11 out her pedo friends.

12  
13 It really sucks for Philip Brumley (**who is also – big surprise! – a pedophile**)  
14 that he, after all these years, still has been unable to uncover the source for much of the  
15 online material that vexes him so greatly. *Jane / John Doe*'s daughter and son-in-law  
16 have been members of this religious cult for many years. The daughter for 15 yrs, and  
17 the son-in-law all his life. And while all members of the Jehovah's Witnesses are  
18 equal, some (such as this son-in-law) are more equal than others, which then allegedly  
19 allows *Jane / John Doe* access to secret files locked in many congregation and branch  
20 offices. It has been claimed that *Jane / John Doe*, under various pseudonyms, has been  
21 busy *doxing* senior and not-so senior members of the Jehovah's Witnesses along with  
22 the internal child abuse / pedophile lists and documents, along with other material that  
23  
24  
25  
26  
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28

1 might be lulz worthy. For examples of whistleblowing and doxing *by others* see:

2 [https://www.reddit.com/r/exjw/comments/ajc3u8/cease\\_desist\\_keep\\_it\\_confidential/](https://www.reddit.com/r/exjw/comments/ajc3u8/cease_desist_keep_it_confidential/)

3  
4 Many have accused *Jane / John Doe* of working closely with the Russian  
5 government by providing them with the names and other identifying information of  
6 known JW's so that if they should try to travel to Russia, the government there will be  
7 able to easily identify them and lock them up for some good old fashioned "re-  
8 education."

9  
10 Supposedly, Stephen Lett is just one of the JW pedophile's whose dox has been  
11 provided to the Russian government. The rest are:

12  
13

- 14 • Kenneth E. Cook, Jr.
- 15 • Samuel Frederick Herd
- 16 • Geoffrey William Jackson
- 17 • Gerrit Lösch
- 18 • Anthony Morris III
- D. Mark Sanderson
- David H. Splane

19  
20 In fact, several people within the Watch Tower organization have privately  
21 accused *Jane / John Doe* of doxing hundreds of JW members. Which might be true.<sup>4</sup>

22  
23  
24  
25

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26       <sup>4</sup> Irwin Zalkin loves my work and so does *JWsurvey.org* and *AvoidJW.org* and  
27 *Faithleaks.org*, which publishes many of the reports and documents. There are 23,720 child abusers  
28 on the Watch Tower's internal pedo list, all to be found on the *Doxbin* website that is accessible via  
TOR.

1           The Governing Body is said to provide “spiritual food” for Jehovah’s Witnesses  
 2 worldwide. But, instead, they are a gang of criminals, fraudsters, and child rapists.<sup>5</sup>  
 3

4           The DMCA subpoena should be quashed because the videos posted are not the  
 5 intellectual property of the Watch Tower religious pedophile cult, but are secret  
 6 “home-made” videos or are EDITED videos containing just enough material so as to  
 7 allow for public debate and criticism. *Jane / John Doe* is a news media reporter  
 8 engaged in whistle blowing and protected First Amendment activities.  
 9

10

11

12 **2. THE WATCH TOWER HAS NO VALID ENFORCEMENT CLAIMS**

13

14           You have to have the registration complete first before suing.

15           While the Copyright Act of 1976 grants automatic copyright privileges to an  
 16 author when it is published to the public, the Act also requires “registration” of that  
 17 copyright with the Copyright Office before bringing an infringement suit if the author  
 18 is American. *Fourth Estate Public Benefit Corp. v. Wall-Street.com*, 586 U.S. \_\_\_,  
 19 139 S. Ct. 881; 203 L. Ed. 2d 147 (2019). In the case at hand, even if the “affirmation”  
 20

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23           <sup>5</sup> **FUN FACT:** In the spring of 2015, Lett unexpectedly starred in a 10-minute video  
 24 that was posted on the Witnesses’ website, an appearance that coincided with a spate of stories about  
 25 abuse allegations and cover-ups published by *Reveal*, from the *Center for Investigative Reporting*.  
 26 Dressed in a dark suit, he grew animated as he urged followers to stay united by “rejecting false  
 27 stories.” “**As an example, think about the apostate-driven lies and dishonesties that Jehovah’s  
 28 organization is permissive toward pedophiles,**” Lett said. “I mean, that is ridiculous, isn’t it? If  
 anyone takes action against someone who would threaten our young ones, and takes action to protect  
 our young ones, it is Jehovah’s organization.” Yeah, right...

1 signed by the pedophile Paul Polidoro is to be believed (and it shouldn't!), the JW's  
2 have not even completed the registration process for at least two of these videos. See  
3 Doc #10 at pg 2. (Jane / John Doe was not able to find the registration records for at  
4 least four other videos via the 'search' function at [https://cocatalog.loc.gov/cgi-  
5 bin/Pwebrecon.cgi?DB=local&PAGE=First](https://cocatalog.loc.gov/cgi-bin/Pwebrecon.cgi?DB=local&PAGE=First))  
6  
7

8 The Supreme Court made clear that the mere filing of an application for  
9 copyright registration with the Copyright Office is not enough. For the registration to  
10 be effective, the Copyright Office must actually process the application and formally  
11 register the copyright. Thus, it stands to reason, there is no valid reason to allow a  
12 DMCA subpoena at this point because for many of the allegedly infringing videos, the  
13 Watch Tower has only just *applied* for copyright registration, but not completed it.  
14  
15

16 While this decision applies only to filing copyright litigation, and does not apply  
17 to other forms of enforcement (such as sending demand letters or issuing DMCA  
18 Section 512 takedown notices), the issuance of a DMCA subpoena and the obtaining  
19 of information is clearly a part of the 'enforcement' process because it invokes the  
20 power of the State to compel obedience, while sending a demand or takedown notice is  
21 an action taken by a private citizen with no state / judicial involvement.  
22  
23

24 The practical implication of *Fourth Estate* is that copyright owners cannot race  
25 to the courthouse from the moment that they file a registration application with the  
26 Copyright Office. Rather, they must wait for the application to actually get approved.  
27  
28

1 In the case at hand, any alleged infringement took place well before any of these works  
 2 were registered and, thus, there can be no enforcement action at this point. Therefore,  
 3 the DMCA subpoena should be quashed as being premature.  
 4

5

6 **3. THE WATCH TOWER IS MERELY ENGAGING IN THEOCRATIC**  
 7 **WARFACE, NOT SEEKING TO VINDICATE ANY 'RIGHTS'**

8

9 Jehovah's Witnesses have a teaching called *Theocratic Warfare Doctrine* that  
 10 allows them to misrepresent or outright lie if they feel the religion is being threatened.  
 11 When they are confronted with the Theocratic Warfare Doctrine as part of their beliefs,  
 12 they will routinely deny that it exists, as that, too, is part of not being truthful by  
 13 pretending it does not exist. The nail in their coffin that many misses is their literature.  
 14 All of their doctrines are clearly written out and explained in detail, which exposes not  
 15 only the truth of matters, but also the fact Theocratic Warfare is practiced down to this  
 16 day. Read the following material below taken directly from their publications and  
 17 learn the actual 'truth' of what Jehovah's Witnesses practice

21       “The faithful witness does not commit perjury when testifying. His testimony is  
 22 not tainted with lies. However, this does not mean that he is under obligation to give  
 23 full information to those who may want to bring harm to Jehovah's people in some  
 24 way. The patriarchs Abraham and Isaac withheld facts from some who did not  
 25 worship Jehovah. (Genesis 12:10-19; 20:1-18; 26:1-10) Rahab of Jericho misdirected  
 26 JANE / JOHN DOE'S REPLY IN SUPPORT OF OBJECTION AND MOTION TO QUASH DMCA

1 the king's men. (Joshua 2:1-7) Jesus Christ himself refrained from divulging total  
 2 information when doing so would have caused needless harm. (John 7:1-10) He said:  
 3 "Do not give what is holy to dogs, neither throw your pearls before swine." Why not?  
 4 So that "they may never . . . turn around and rip you open."—Matthew 7:6."

5 **Watchtower 2004 Nov 15, p.28**

6  
 7 "Sarai could say that she was Abram's sister because she really was his half-  
 8 sister. (Genesis 20:12) Furthermore, he was not under obligation to divulge  
 9 information to people who were not entitled to it. (Matthew 7:6) Faithful servants of  
 10 God in modern times heed the Bible's command to be honest. (Hebrews 13:18) They  
 11 would never, for instance, lie under oath in a court of law. When the physical or  
 12 spiritual lives of their brothers are at stake, such as in times of persecution or civil  
 13 distress, however, they heed Jesus' counsel to be "cautious as serpents and yet  
 14 innocent as doves." **Watchtower 2001 Aug 15, p.20**

15  
 16 "Of course, being truthful does not mean that we are obligated to divulge all  
 17 information to anyone who asks it of us. Do not give what is holy to dogs, neither  
 18 throw your pearls before swine, that they may never . . . turn around and rip you open,  
 19 warned Jesus, at Matthew 7:6. For example, individuals with wicked intent may have  
 20 no right to know certain things. Christians understand that they are living in a hostile  
 21 world. Thus, Jesus advised his disciples to be cautious as serpents while remaining  
 22 innocent as doves. (Matthew 10:16; John 15:19) Jesus did not always disclose the full  
 23  
 24 JANE / JOHN DOE'S REPLY IN SUPPORT OF OBJECTION AND MOTION TO QUASH DMCA  
 25  
 26 SUBPOENA- 10

1 truth, especially when revealing all the facts could have brought unnecessary harm to  
2 himself or his disciples. Still, even at such times, he did not lie. Instead, he chose either  
3 to say nothing or to divert the conversation in another direction.” ***Awake! 2000 Feb 8,***  
4  
5 **p.21**

6 “Jehovah had the land “vomit” those depraved humans out of their territory,  
7 using theocratic warfare to have it done. (Leviticus 18:1-30; Deuteronomy 7:1-6, 24)  
8  
9 This justifies the spiritual warfare of the Christian today.” ***Watchtower 1986 Sep 1,***

10  
11 **p.18**

12 “From time to time letters are received asking whether a certain circumstance  
13 would justify making an exception to the Christian’s obligation to tell the truth. In  
14 reply to these the following is given: God’s Word commands: “Speak truth each of you  
15 with his neighbor.” ...  
16

17 There is one exception, however, that the Christian must ever bear in mind. As a  
18 soldier of Christ he is in theocratic warfare and he must exercise added caution when  
19 dealing with God’s foes. Thus the Scriptures show that for the purpose of protecting  
20 the interests of God’s cause, it is proper to hide the truth from God’s enemies. A  
21 Scriptural example of this is that of Rahab the harlot. She hid the Israelite spies  
22 because of her faith in their God Jehovah. This she did both by her actions and by her  
23 lips. That she had Jehovah’s approval in doing so is seen from James’ commendation  
24 of her faith.” ***Watchtower 1960 Jun 1, pp.351, 352 Questions From Readers***  
25  
26

1       “We must tell the truth to one who is entitled to know, but if one is not so  
 2 entitled we may be evasive. ... As a soldier of Christ he is in theocratic warfare and he  
 3 must exercise added caution when dealing with God’s foes. Thus the Scriptures show  
 4 that for the purpose of protecting the interests of God’s cause, it is proper to hide the  
 5 truth from God’s enemies.” **Watchtower 1960 Jun 1, pp.351-352**  
 6  
 7

8       “Today God’s servants are engaged in a warfare, a spiritual, theocratic warfare,  
 9 a warfare ordered by God against wicked spirit forces and against false teachings.  
 10 God’s servants are sent forth as sheep among wolves and therefore need to exercise the  
 11 extreme caution of serpents so as to protect properly the interests of God’s kingdom  
 12 committed to them. At all times they must be very careful not to divulge any  
 13 information to the enemy that he could use to hamper the preaching work.”  
 14  
 15

16       **Watchtower 1957 May 1, p.286**  
 17

18       “While malicious lying is definitely condemned in the Bible, this does not mean  
 19 that a person is under obligation to divulge truthful information to people who are not  
 20 entitled to it. Jesus Christ counseled: “Do not give what is holy to dogs, neither throw  
 21 your pearls before swine, that they may never trample them under their feet and turn  
 22 around and rip you open.” (Mt 7:6) That is why Jesus on certain occasions refrained  
 23 from giving full information or direct answers to certain questions when doing so  
 24 could have brought unnecessary harm. (Mt 15:1-6; 21:23-27; John 7:3-10)”  
 25  
 26  
 27  
 28

1       “Evidently the course of Abraham, Isaac, Rahab, and Elisha in misdirecting or  
 2 in withholding full facts from nonworshipers of Jehovah must be viewed in the same  
 3 light.—**Ge 12:10-19; chap 20; 26:1-10; Jos 2:1-6; Jas 2:25; 2Ki 6:11-23 Insight**  
 4 **Book.**

5       Thus, even under oath, you simply cannot trust a god damn thing these people  
 6 say!

7

8

9

10 **4. THE WATCH TOWER HAS NOT MET ALL THE ARISTA RECORDS**  
 11 **FACTORS JUSTIFYING A DMCA SUBPOENA**

12

13       As stated by the Watch Tower organization in their memorandum, “The First  
 14 Amendment does not...provide a license for copyright infringement.” *Arista Records,*  
 15 *LLC v. Doe*, 604 F. 3d 110, 118 (2d. Cir. 2010). In *Arista*, the Second Circuit  
 16 identified the “principal factors” for courts to consider in such cases as including: “(1)  
 17 the concreteness of the plaintiff’s showing of a *prima facie* claim of actionable harm,  
 18 (2) the specificity of the discovery request, (3) the absence of alternative means to  
 19 obtain the subpoenaed information, (4) the need for the subpoenaed information to  
 20 advance the claim, and (5) the objecting party’s expectation of privacy.” *Arista*,  
 21 604F.3d at 119 (quoting *Sony Music Entm’t Inc. v. Does 1-40*, 326 F. Supp. 2d 556,  
 22 564-65(S.D.N.Y. 2004)).

1           In the case at hand, the JWs ignore the fact that there is an alternative means to  
 2 obtain the subpoenaed information – they simply could have sent an email to the  
 3 YouTube account holder and asked!!  
 4

5           *Jane / John Doe* would be willing to give them my real name and address as  
 6 long as they promise to follow through and actually file a copyright lawsuit against me  
 7  
 8 – **and are willing to post a \$5,000,000 bond** payable to me should they fail to follow  
 9 through within 30 days (and no nonsuits, either, we go to trial and a verdict or no  
 10 deal!). But we both know that they won’t – this is a group of pedophiles, after all!  
 11  
 12 Child abusers abuse children because kids cannot fight back. I will fight back, and I  
 13 will beat the ever-living hell out of them.  
 14

15           But not once has the Watch Tower ever filed a copyright lawsuit. In the 59  
 16 other DMCA subpoena cases I mentioned earlier, all they do is run to their pet judge  
 17 and get her to rubber stamp subpoenas, which they then use to try to ferret out  
 18 dissenters and apostates. Watch Tower’s chief strategy includes scouring the internet  
 19 for “infringing” materials, which include, but are not limited to photos, documents, and  
 20 videos which Watch Tower has produced using an all-volunteer workforce.  
 21  
 22

23           Once located, Watch Tower’s attorneys determine whether the individual behind  
 24 the offending account is an “apostate.” If they believe the person might be connected  
 25 to insider leaks, or if they have posted already-leaked information, Watch Tower  
 26 attorneys initiate DMCA takedown measures.  
 27  
 28

1 Watch Tower does not stop at DMCA content removal, however. Their legal  
 2 team next files a DMCA subpoena to identify the alleged infringer(s) in an attempt to  
 3 obtain all personally identifying information related to the individual who posted on  
 4 one or more social media or web sites (i.e. to *dox* them)

5 Due to *Jane / John Doe*'s insider access via their JW daughter and son-in-law,  
 6 this game of DMCA Whac-A-Mole has been going on for years and the Watch Tower  
 7 has yet to successfully plug this particular leak (thanks to TOR and an unlimited  
 8 supply of unsecured Wi-Fi access points all over the country).

9 For the Court's edification, the cases against apostate infringers has risen swiftly  
 10 since 2017, when numerous leaked videos and documents surfaced, leaving Watch  
 11 Tower scratching their heads, wondering how sensitive information was escaping their  
 12 global network of trusted Witness Elders, Ministerial Servants, Circuit Overseers and  
 13 Branch Committee members. That date, not so coincidentally, also coincides with the  
 14 time period *Jane / John Doe*'s daughter and son-in-law returned to the U.S. after living  
 15 overseas several years in service to the Watch Tower after receiving indoctrination  
 16 from the *Watchtower Bible School of Gilead*; thus, the leaks began!

17 Governing Body member Stephen Lett recently said a few weeks ago: "We  
 18 should strive very hard not to ever try to get to know confidential things we're not  
 19 entitled to know. And we certainly should not reveal confidential things."  
 20 Unfortunately for Lett, *Jane / John Doe*'s son-in-law is a very senior elder / overseer in  
 21  
 22 JANE / JOHN DOE'S REPLY IN SUPPORT OF OBJECTION AND MOTION TO QUASH DMCA  
 23  
 24 SUBPOENA- 15

1 the JW organization who is kind enough to provide me with access to their very secret  
2 documents and congregation records. Opening locked file cabinets with a set of  
3 allegedly stolen keys, and removing or making copies of sealed documents is just part  
4 of the effort at exposing this group of rabid baby rapists to the world at large.

5 YouTube has been hit the hardest by Watch Tower's repetitive subpoena  
6 warfare, particularly since 2017, when multiple sensitive videos were leaked to the  
7 public from numerous sources. Among those videos were the infamous "Pillowgate"  
8 info-videos, where two high-ranking Jehovah's Witness Branch Committee members  
9 explained the intricacies of pillow-humping and various masturbation techniques found  
10 to be practiced by both male and female members of Watch Tower headquarters.  
11  
12 (seriously!)

13 The orchestrated attacks on the "infringers" have become a driving passion for  
14 Watch Tower's legal department, located primarily in its Patterson, New York  
15 complex. Already laden down with an abundance of child abuse cases and other legal  
16 concerns, Watch Tower has allocated its top attorneys to this issue, including their  
17 legal Overseer Phillip Brumley, along with Paul Polidoro and Mario Moreno.

18 Unfortunately for the Watch Tower, its "top" attorneys are clearly not up to this  
19 task.<sup>6</sup> Too busy raping children, is my guess.

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27         <sup>6</sup> Brumley, like many of the other members of the Jehovah's Witness legal department,  
28 is a congregation elder (and a pedophile). His education was paid for by Watch Tower, with the  
intent of grooming him to oversee Watch Tower's expanding global legal departments. In a 1991  
JANE / JOHN DOE'S REPLY IN SUPPORT OF OBJECTION AND MOTION TO QUASH DMCA

1 **5. THE WATCH TOWER IS MERELY A COPYRIGHT TROLL**

2

3 Even if this DMCA subpoena rabbit trail did not end at a TOR exit node

4 accessed via some random person's unsecured Wi-Fi, the Court should deny the

5 DMCA subpoena because the JW's are merely copyright trolls and courts across the

6 United States have uniformly rejected the notion that an IP address alone is sufficient

7 to establish a copyright violation.

8

9 Most recently, the Ninth Circuit held that a defendant's "status as the registered

10 subscriber of an infringing IP address, standing alone, does not create a reasonable

11 inference that he is also the infringer." *Cobbler Nevada, LLC v. Gonzales*, 901 F.3d

12 1142, 1145 (9th Cir. 2018). Instead, to cross "the line between possibility and

13 plausibility to relief," a plaintiff "must allege something more to create a reasonable

14 inference that a subscriber is also an infringer." *Id.* at 1145, 1147 (quoting *Ashcroft v.*

15 *Iqbal*, 556 U.S. 662, 678 (2009)). As the Ninth Circuit noted, providing the identity of

16 the IP subscriber "solves only part of the puzzle" because "multiple devices and

17 individuals may be able to connect via an IP address." *Id.* at 1145.

18

19

20

21

22 Thus, this subpoena serves no purpose.

23

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24 speech, Brumley discussed the legal wranglings of Watch Tower and stated that apostate Witnesses

25 have never prevailed against the organization in a court of law. Brumley said: "We have never lost a

26 case against apostates. They never won even a motion. And so you see the line that Jehovah has

27 apparently drawn: That the wicked or evil slave will not be able to beat the faithful slave to that

28 degree. Because even though there have been hundreds of these motions and cases brought; not one

has prevailed." Unfortunately for Brumley, this is the year 2020 and things have changed – thanks to

people like *Jane / John Doe*, the WT has been beaten like a red-headed stepchild.

JANE / JOHN DOE'S REPLY IN SUPPORT OF OBJECTION AND MOTION TO QUASH DMCA  
SUBPOENA- 17

1 **6. GOOGLE / YOUTUBE IS NOT SUBJECT TO THIS COURT'S SUBPOENA**  
 2 **POWER**

3 Google / YouTube is a Delaware corporation with its principal place of business  
 4 in California, and therefore is not subject to the subpoena power of New York courts.  
 5 See *Gucci America, Inc. v. Weixing Li*, 768 F.3d 122, 135 (2d Cir. 2014) (“the district  
 6 court may not properly exercise general personal jurisdiction over the Bank. Just like  
 7 the defendant in Daimler, the nonparty Bank here has branch offices in the forum, but  
 8 is incorporated and headquartered elsewhere.”); see also *id.* at 141 (“A district court . . .  
 9 . must have personal jurisdiction over a nonparty in order to compel it to comply with a  
 10 valid discovery request under Federal Rule of Civil Procedure 45.”); *Kline v.*  
 11 *Facebook, Inc.*, No. 150022/2018, 2019 WL 185767 (N.Y. Co. Sup. Jan. 10, 2019)  
 12 (holding that Facebook is not subject to personal jurisdiction in New York in a matter  
 13 seeking pre-action discovery of Facebook account information). See Fed. R. Civ. P.  
 14 45(c)(2)(A); *Europlay Capital Advisors, LLC, et al. v. Does*, 323 F.R.D. 628, 629-30  
 15 (C.D. Cal. 2018) (“despite Google having an office in Venice, the proper district to  
 16 hear a motion to compel is where Google is headquartered.”) (collecting cases).

17  
 18 Because the Google is not subject to this Court's subpoena powers, the motion  
 19 to quash should be granted.  
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### **C. CONCLUSION**

In conclusion, the amount of contempt that I feel for this pedophile religious cult – and each and every one of its individual members (all 7 million) – cannot be overestimated.

The amount of hatred that I feel for these people cannot be over exaggerated. If I had my way, every single member of the Watch Tower organization would be wearing purple triangles on eastward bound trains for a one-way trip to the ash heap of history.

The whole point of this response, Judge Seibel, is to get you to think first before you pull out your rubber stamp when these assholes show up on your doorstep hollering about alleged copyright violations. Recall the bullshit that they pulled on you just a year ago in Case No. 7:18-mc-00471 with Facebook and their ‘contempt’ nonsense. (FYI: While Jeffrey D. Vanacore of Perkins Coie might be perfectly willing to bend over and grab his ankles at the behest of the Watch Tower organization, *Jane / John Doe* is not so amiable to anal sodomy.)

It does not really matter so much what you do in this case. The only info that YouTube would be able to respond with is spoofed IP and account info that leads nowhere or to some innocent person. But the next apostate might not be so careful. Lives are at stake here in what you do, Judge Seibel. You need to be more cognizant of the fact that these people are a bunch of damn liars, pedophiles, and bullies. If

1 necessary, I can and will fight them, and make them suffer for it. But other people do  
2 not have the resources and fortitude that I have at my disposal.  
3  
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7 Respectfully submitted,  
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Dated: April 1, 2020

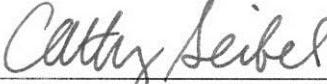
/s/  
Jane / John Doe  
*Pro se*

15 Movant's original arguments for quashing were without merit. Shield laws are inapplicable here because Movant is  
16 not being asked to reveal a journalistic source, and the First Amendment does not protect copyright infringement. But  
17 Movant has raised two factual issues in the instant reply that I believe merit a response by Watchtower. (By the way,  
I will accept Movant's by email this one time only because of the difficulties caused by the corona virus pandemic.  
18 Any future submissions must be made in conformity with the Standing Order issued by the Chief Judge regarding pro  
se electronic submissions during the emergency

19 First, Movant challenges the good faith of Watchtower's representation that its purpose in seeking a DMCA subpoena  
20 is solely to identify a potential defendant for a copyright infringement action, alleging that Watchtower has invoked  
the 59 times without ever then bringing such a lawsuit. The Court can imagine reasons for that fact (if it is a fact) that  
21 do not evidence lack of good faith, but Watchtower should address (by declaration or affidavit of someone with  
knowledge) whether it is true, and if so, why I should not conclude that it evidences lack of good faith.

22 Second, there seems to be a factual dispute as to what material belonging to Watchtower was allegedly used by  
23 Movant. Neither side has provided sworn declarations on this issue. Watchtower suggests that Movant posted full  
videos produced by Watchtower. Movant says he posted: 1) "undercover" videos of meetings, in which (he suggests)  
24 Watchtower would have no copyright rights; and 2) portions of videos produced by Watchtower, which (he implies)  
would be fair use because it was part of criticism. *See In re DMCA Subpoena to Reddit, Inc.*, No. 19-MC-80005,  
2020 WL 999788 (N.D. Cal. Mar. 2, 2020). Accordingly, Watchtower should address (by declaration or affidavit of  
25 someone with knowledge) what exactly it claims was infringed by Movant and how.

26 Watchtower's submission shall be submitted by 4/17/20. Movant may reply (also by declaration or affidavit on  
27 personal knowledge) by 5/1/20.

28 SO ORDERED.  
JANE / JOHN DOE'S REPLY ]   
CATHY SEIBEL, U.S.D.J. AND MOTION TO QUASH DMCA  
4/2/20

**CERTIFICATE OF SERVICE**

I certify that on April 1, 2020, a copy of this document was delivered by a friend of mine far across the country to the US District Court Clerk's office by US Mail, which will automatically serve a Notice of Electronic Filing on the Watch Tower organization.

I certify that Watch Tower attorney (and pedophile) Paul Polidoro is a registered CM/ECF user and that service will be accomplished by the CM/ECF system.

/s/  
Jane / John Doe  
Pro se

Cc

Google Legal Investigations Support  
1600 Amphitheatre Parkway  
Mountain View, CA 94043  
via email: [Copyright@YouTube.com](mailto:Copyright@YouTube.com)  
and [usernotice@google.com](mailto:usernotice@google.com)

Paul D. Polidoro  
Associate General Counsel  
Legal Department  
200 Watchtower Drive  
Patterson, NY 12563-9204  
Email: [inboxLGLipg@jw.org](mailto:inboxLGLipg@jw.org)